

**USERY & ASSOCIAT**

LISA SZCZEPANSKI, ESQ.  
Admitted in NY

MAILING ADDRESS:  
P.O. BOX 2996  
HARTFORD, CT 06104

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 3/9/2023

Tel.: (917) 778-6680  
Fax: (844) 571-3789

March 8, 2023

**Via ECF**

Hon. Analisa Torres  
U.S. District Court for the Southern District of New York  
500 Pearl St., Rm. 15D  
New York, NY 10007

Re: *Northfield Insurance Company v. NOA-LIOR, LLC, et al.*  
Case No. 1:23-cv-00216-AT

Dear Judge Torres:

This office represents plaintiff Northfield Insurance Company (“Northfield”) in connection with the above-referenced action. We submit this request, pursuant to section I.C. of the Court’s Individual Practices in Civil Cases, for an extension of the deadline set forth in the Initial Pretrial Scheduling Order dated January 12, 2023 (Dkt. No. 16) to file a joint letter and proposed Case Management Plan and Scheduling Order.

Service was effectuated on the defendants as follows:

- NOA-LIOR, LLC via Secretary of State on January 18, 2023 (Dkt. No. 19);
- B.C.N. Management, LLC via Secretary of State on January 18, 2023 (Dkt. No. 23);
- BCN Development NY, LLC via Secretary of State on January 18, 2023 (Dkt. No. 22);
- Structureline Inc. via Secretary of State on January 18, 2023 (Dkt. No. 20);
- UA Builders Group via Secretary of State on January 18, 2023 (Dkt. No. 21); and
- Henry Alejandro Pinzon Cuellar via delivery to a person of suitable age and discretion and mail on January 27, 2023 (Dkt. No. 24).

To date, no appearance has been entered on behalf of any defendant.

*Not a Partnership or Professional Corporation. All attorneys are employees of The Travelers Indemnity Company and its Property Casualty Affiliates.*

CALIFORNIA OFFICE:  
401 LENNON LANE  
WALNUT CREEK, CA 94598

CONNECTICUT OFFICE:  
ONE TOWER SQUARE  
MS04A-0000  
HARTFORD, CT 06183

NEW YORK OFFICE:  
485 LEXINGTON AVENUE  
6<sup>TH</sup> FLOOR  
NEW YORK, NY 10017

PENNSYLVANIA OFFICE:  
10 Sentry Parkway  
Suite 300  
Blue Bell, PA 19422

The current deadline to file a joint letter and proposed Case Management Plan and Scheduling Order is March 13, 2023. See Dkt. No. 16. Northfield respectfully requests a 30-day extension of this deadline in order to allow the defendants sufficient opportunity to appear in this action. Northfield intends to seek default judgment against any defendant that has not entered an appearance by the adjournment date. No prior request has been made for the relief sought herein.

Thank you for Your Honor's attention and consideration.

Respectfully submitted,



Lisa Szczepanski

GRANTED. By **April 12, 2023**, the parties shall file a joint letter and proposed case management plan.

SO ORDERED.

Dated: March 9, 2023  
New York, New York



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ANALISA TORRES  
United States District Judge